

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 07**

**To: Cal Advocates**  
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**Response Date: 4/7/2023**

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**Question 12:**

On p. 394 of your 2023 WMP, SCE states:

In 2022, inspections of SCE's Distribution Routine Line Clearing were conducted on a grid-by-grid basis while inspections for other Vegetation Management programs such as Transmission Routine Line Clearing, HTMP, and Dead and Dying Tree Removal inspections were conducted on a circuit basis. In 2023, inspections for all programs will be conducted on a grid basis ...

- a) Why were Distribution Routine Line Clearing inspections conducted on a different basis than other VM inspection programs, prior to 2023?
- b) What are the advantages of conducting Distribution Routine Line Clearing inspections on a grid-by-grid basis?
- c) What are the advantages of conducting Transmission Routine Line Clearing, HTMP, and Dead and Dying Tree Removal inspections on a circuit basis?

**Response to Question 12:**

Prior to responding to each sub-part of this question, SCE notes that as part of the errata it filed on April 6, 2023, the last sentence in the quoted text from this question has been modified to read (underline indicates language added via errata): "In 2023, inspections related to distribution assets for HTMP, Dead and Dying Tree Removal, and Routine Line Clearing program will be conducted on a grid basis...."

a. Prior to the implementation of SCE's first Wildfire Mitigation Plan in 2019, it was SCE's long-standing practice to operate two separate Vegetation Management (VM) programs: (1) routine line clearing for Transmission / Distribution, and (2) Dead and Dying Tree (D&DT) inspections (formerly known as DRI). Transmission Routine Line Clearing and D&DT were performed using a circuit-based approach, which enables a single contractor to assume responsibility for completing the work on the entire circuit (substation to substation) even if the circuit traverses multiple districts.

Distribution Routine Line Clearing (which comprises the bulk of SCE's VM work) was performed using a grid/polygon approach because smaller, geographically adjacent bundles of work can be coordinated and measured for completion and invoiced on a more timely basis. SCE is now planning to integrate VM inspections on a circuit basis, as described in SCE's WMP.

b. The advantage of conducting Distribution Routine Line Clearing inspections on a grid-by-grid basis is that smaller, geographically adjacent bundles of work can be coordinated and measured for completion and invoiced on a more timely basis. This also helps in planning the work to maintain a normalized amount of contractor work volume on a monthly basis.

c. The advantages of conducting Transmission Routine Line Clearing, HTMP, and Dead and Dying Tree Removal inspections on a circuit basis include facilitating better documentation of compliance with NERC Reliability Standard FAC-003-4 annual inspections, ability to assign contractors to a complete circuit (even if the circuit traverses multiple districts), and integration with other wildfire mitigation efforts. (e.g., PSPS).